

REMARKS

Claims 23-68 are currently pending in the application. In the Office Action, dated August 22, 2007, claims 23-68 were rejected. By this Amendment, claims 23, 43, and 56 have been amended, without acquiescence or prejudice to pursue the original claims in a related application. No new matter has been added.

Claim Rejections - 35 USC § 102

Claims 23-68 are rejected under 35 U.S.C. 102(e) as being anticipated by Wu et al. (Wu' hereinafter) (Publication Number 2004/0066529).

1. Claim 23 recites "the one or more collection elements are designated to be part of the collection with a markup language...wherein the collection partition comprises a subset of the collection elements in the document, wherein the subset of collection elements comprises at least one collection element in addition to the at least one identified collection element ... executing the document operation with the collection partition." Claims 43 and 56 recite similar limitations. Applicants respectfully submit that Wu discloses **acquiring all display content data of the document elements** that will fit on a page in order to perform a print of the document, and Wu does not disclose **executing** the document operation with the collection partition, the collection partition comprising a **subset of collection elements** in the document with at least one collection element **in addition to** the at least one **identified collection element**.

According to the Office Action, paragraph [0100] of Wu allegedly discloses "receiving a document operation request, the document operation requiring one or more collection elements in a collection within the document to be in a computer readable memory...identifying a collection partition associated with the at least one identified collection element, wherein the collection element comprises a subset of the collection

elements in the document and the at least one identified collection element...executing the document operation with the collection partition (e.g. print).” Applicants have amended the independent claims to clarify a collection partition. Wu does not disclose **executing** the document operation with the collection partition, the collection partition comprising a **subset of collection elements** in the document with at least one collection element **in addition to** the at least **one identified collection element**.

Wu is directed toward handling the printing of a document when the requested data is acquired at different times from servers over the internet (Wu, page 1, [0010]). Specifically, Wu discloses loading and unloading data from RAM at the level of granularity of document elements (Wu, page 8, [0100]). Wu is silent with respect to loading more than one element at a time into RAM, much less loading a **subset of collection elements in the document** with at least one collection element **in addition to** the at least **one identified collection element**. In contrast, the focus of Wu is handling the problem of receiving document elements one at a time that are required for a print operation. Thus, Wu discloses acquisition of content data an element at a time, and does not disclose **loading** the collection partition, the **collection partition** comprising a **subset of collection elements in the document** and the at least one **identified collection element**.

2. Amended claim 23 recites “the one or more **collection elements** are **designated to be** part of the **collection** with a **markup language**...wherein the collection partition comprises a **subset of collection elements** in the document... **executing** the document operation with the collection partition.” Claims 43 and 56 recite similar limitations. Applicants respectfully submit that Wu discloses **acquiring all display content data of the document elements** that will fit on a page in order to perform a print of the document, and Wu does not disclose

executing the document operation with the collection partition, comprising a **subset of collection elements** in the document, and the one or more **collection elements** are **designated to be part of the collection with a markup language**.

According to the Office Action, paragraph [0100], [0110] and [0061] of Wu allegedly discloses “receiving a document operation request, the document operation requiring one or more collection elements in a collection within the document to be in a computer readable memory, wherein the one or more collection elements are designated to be part of the collection with a markup language...executing the document operation (e.g. print).”

Applicants respectfully submit that Wu discloses printing a document when **all of the content data of the document elements** has been acquired and does not disclose **executing** the document operation with the collection partition, the collection partition comprises a **subset of collection elements** in the document and the one or more **collection elements** are **designated to be part of the collection with a markup language**.

Wu discloses that document data is analyzed and divided into pages based upon the size of the document elements. (Wu, page 3, [0047] and page 6, [0073]). As shown in Figure 7, to perform the printing, Wu discloses that a determination is made as to whether **all the display content data of the document elements** for the page has been acquired (S21) and the print is terminated if the display content data is not acquired. (Wu, page 6, [0074]). Specifically, Wu teaches reloading of content data for document elements if the content data has previously been unloaded in order to print the document. (Wu, page 8, [0100]).

Wu discloses **acquiring all display content data of the document elements** that will fit on a page in order to perform a print of the document. Wu is silent with respect to **collection elements, designated to be part of the collection with a markup language**. To the extent that the Examiner considers document elements of a page to be collection

elements, the document elements for a page are chosen after analysis of the content elements and are not designated to be part of a collection with a markup language. Further, the execution of a document print is not possible with a subset of document elements in Wu because **all display content data of the document elements** for the page are necessary to perform the print of the document. Thus, Wu does not disclose **executing** the document operation with the collection partition, comprising a **subset of collection elements** in the document, and the one or more **collection elements** are **designated** to be part of the **collection** with a **markup language**.

For at least these reasons, Applicants submit that Wu fail to anticipate every limitation of claim 23. Because claims 43 and 56 share each of the limitations of claim 23 discussed above, they are not anticipated by Wu. Furthermore, because claims 24-42, 44-55, and 57-68 depend from claims 23, 43, and 56, they also are not anticipated by Wu.

Applicants assert that, for at least the above reasons, Wu fails to anticipate Claims 23-68 of the present application. Accordingly, Applicants respectfully request that this rejection be withdrawn.

CONCLUSION

Based on the foregoing, all claims are believed allowable, and an allowance of the claims is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

If the Commissioner determines that additional fees are due or that an excess fee has been paid, the Patent Office is authorized to debit or credit (respectively) Deposit Account No. 50-4047, billing reference no. 7035722001.

Respectfully submitted,



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